

EXHIBIT B

VIRTUAL IMMERSION TECHNOLOGIES LLC'S INFRINGEMENT ANALYSIS

U.S. Patent No. 6,409,599 – Toyota Motor Corporation and Toyota Motor North America, Inc.

Claim 9

Virtual Immersion Technologies LLC (“VIT”) provides evidence of infringement of claim 9 of U.S. Patent No. 6,409,599 (hereinafter “the ’599 patent”) by Toyota Motor Corporation and Toyota Motor North America, Inc. (collectively “Toyota”). In support thereof, VIT provides the following claim charts.

“Accused Instrumentalities” as used herein refers to at least its virtual reality and augmented reality technologies, including but not limited to its use of software platforms such as ESI Group’s IC.IDO, nVidia’s Holodeck, and others to enable companywide virtual collaborative design. The functionality of these services includes virtual and augmented reality functionality that infringes upon the ’599 patent. These claim charts demonstrate Toyota’s infringement, and provide notice of such infringement, by comparing each element of the asserted claims to corresponding components, aspects, and/or features of the Accused Instrumentalities. These claim charts are not intended to constitute an expert report on infringement. These claim charts include information provided by way of example, and not by way of limitation.

The analysis set forth below is based only upon information from publicly available resources regarding the Infringing Instrumentalities, as Toyota has not yet provided any non-public information. An analysis of Toyota’s (or other third parties’) technical documentation may assist in fully identify all infringing features and functionality. Accordingly, VIT reserves the right to supplement this infringement analysis once such information is made available to VIT. Furthermore, VIT reserves the right to revise this infringement analysis, as appropriate, upon issuance of a court order construing any terms recited in the asserted claims.

Unless otherwise noted, VIT contends that Toyota directly infringes the ’599 patent in violation of 35 U.S.C. § 271(a) by selling, offering to sell, making, using, and/or importing the Infringing Instrumentalities. The following exemplary analysis demonstrates that infringement. Unless otherwise noted, VIT further contends that the evidence below supports a finding of indirect infringement under 35 U.S.C. §§ 271(b) and/or (c), in conjunction with other evidence of liability under one or more of those subsections. Toyota makes, uses, sells, imports, or offers for sale in the United States, or has made, used, sold, imported, or offered for sale in the past, without authority, or induces others to make, use, sell, import, or offer for sale in the United States, or has induced others to make, use, sell, import, or offer for sale in the past, without authority products, equipment, or services that infringe claim 9 of the ’599 patent, including without limitation, the Accused Instrumentalities.

Unless otherwise noted, VIT believes and contends that each element of each claim asserted herein is literally met through Toyota’s provision of the Infringing Instrumentalities. However, to the extent that Toyota attempts to allege that any asserted claim element is not literally met, VIT believes and contends that such elements are met under the doctrine of equivalents. More specifically, in its investigation and analysis of the Infringing Instrumentalities, VIT did not identify any substantial differences between the elements of the patent claims and the corresponding features of the Infringing Instrumentalities, as set forth herein. In

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each instance, the identified feature of the Infringing Instrumentalities performs at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.

To the extent the chart of an asserted claim relies on evidence about certain specifically-identified Accused Instrumentalities, VIT asserts that, on information and belief, any similarly-functioning instrumentalities also infringes the charted claim. VIT reserves the right to amend this infringement analysis based on other products made, used, sold, imported, or offered for sale by Toyota. VIT also reserves the right to amend this infringement analysis by citing other claims of the '599 patent, not listed in the claim chart, that are infringed by the Accused Instrumentalities. VIT further reserves the right to amend this infringement analysis by adding, subtracting, or otherwise modifying content in the "Accused Instrumentalities" column of each chart.


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Toyota Virtual Reality Collaborative Design Reviews – <https://www.youtube.com/watch?v=0e4187XNaW4&t=15s>

Toyota/Lexus Global R&D and USA facilities utilize multiple platforms (such as ESI Group's IC.IDO and nVidia's Holodeck) that allow collaboration among Toyota's designers and customers in the USA and globally.

Claim	US Patent 6,409,599	Description of the System
9	A method of providing interactive communications between participants and performers comprising the steps of:	<p>Toyota employees and customers utilize an interactive virtual reality system that allows collaboration for design reviews for new vehicles and manufacturing lines, well before physical products have been created saving tens of millions and accelerating product introduction times.</p> <p>Virtual environment = Multiple virtual environments containing vehicles and assembly lines.</p> <p>Performer = Various members of Toyota and its subsidiaries as avatars and/or a fully motion captured "performer" enacting a variety of processes lead a design review.</p> <p>Participants = One or more Toyota employees, contractors or customers engage locally or remotely to learn from or provide feedback to the simulation organizer/leader.</p>  <p>Typically the virtual environment collaboration is led by a project manager, head engineer or expert in a certain function of the project.</p>


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		<p>See: https://www.youtube.com/watch?v=0e4187XNaW4&t=15s See also: https://www.youtube.com/watch?v=N4NbhuPsGAA See also: https://www.youtube.com/watch?v=cwfvurDGdjc See also: https://www.youtube.com/watch?v=V7F5JLAL-Wo&feature=youtu.be See also: https://www.youtube.com/watch?v=bFNI3Iji0_c See also: https://virtualreality.esi-group.com/our-profile/our-clients-across-world See also: https://robotstart.info/2017/12/15/gtc2017-holodeck.html See also: https://www.wardsauto.com/technology/toyota-tilts-toward-future-maker-lab See also: https://www.esi-group.com/pt/empresa/eventos/2016/tra2016/agenda See also: https://www.cimdata.com/images/PLMRoadMap/ESI_Corporate_Brochure_2018.pdf See also: https://www.youtube.com/watch?v=ReQVmXB5we0 See also: https://www.pny.com/File%20Library/Case%20Studies/Toyota-Case-Study.pdf See also: https://www.pinterest.co.uk/pin/35536284545651992/ See also: https://www.nvidia.com/en-us/design-visualization/technologies/holodeck/ See also: https://www.digitalengineering247.com/article/reinventing-collaboration-for-ar-vr/virtual-reality-and-augmented-reality</p>
a)	providing an immersive virtual reality environment	<p>Immersive Virtual Reality environment = 3D digital environment of models of Toyota/Lexus vehicles or facility designs.</p>  <p>See: https://www.youtube.com/watch?v=0e4187XNaW4&t=15s See also: https://www.youtube.com/watch?v=N4NbhuPsGAA</p>


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b)	providing at least one performer input device in electronic communication with said immersive virtual reality environment;	<p>Performer input devices = Performers can utilize more extensive body motion-capture systems and controls to simulate participant interactions with new facility simulations, which can use cameras or motion trackers to sense body motion. The meeting leaders or lead engineers interact with other participants and the VR environment using high-end VR glasses (see participant input devices) with motion sensors and microphones, as well as other hardware and software controls. For collaboration to remote participants, the performers likely use microphones for voice communication, also keyboard/mouse/gamepad to control performer live streaming avatars and virtual devices.</p> <p>See: https://www.youtube.com/watch?v=V7F5JLAL-Wo&feature=youtu.be</p> <p>See also: https://www.youtube.com/watch?v=0e4187XNaW4&t=15s</p> <p>See also: https://virtualreality.esi-group.com/our-profile/our-clients-across-world</p> <p>See also: https://robotstart.info/2017/12/15/gtc2017-holodeck.html</p> <p>See also: https://www.youtube.com/watch?v=bFNI3IJI0_c</p> <p>See also: https://www.wardsauto.com/technology/toyota-tilts-toward-future-maker-lab</p> <p>See also: https://www.esi-group.com/pt/empresa/eventos/2016/tra2016/agenda</p> <p>See also: https://www.youtube.com/watch?v=ReQVmXB5we0</p> <p>See also: https://www.pny.com/File%20Library/Case%20Studies/Toyota-Case-Study.pdf</p> <p>See also: https://www.nvidia.com/en-us/design-visualization/technologies/holodeck/</p>

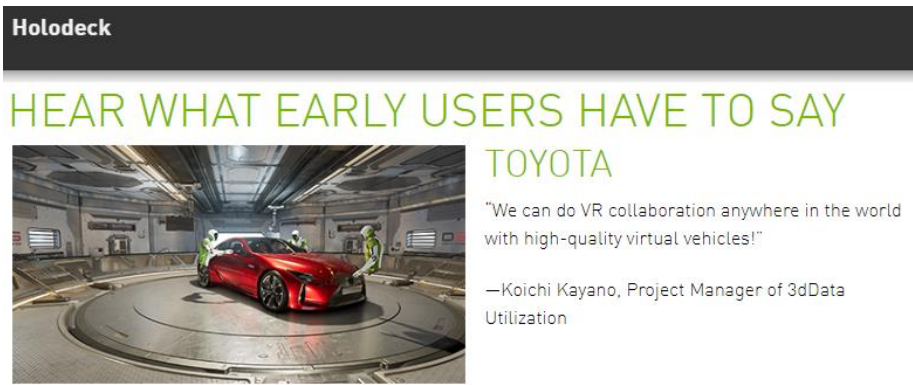
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c)	providing at least one participant input device in electronic communication with said immersive virtual reality environment;	<p>Participant input device = Toyota employees and customers utilize input sensors within the VR glasses, hand sensors (motion sensors, audio controls, etc.), keyboard and mouse, cameras, as well as telephones/microphones to collaborate by voice. A variety of software and visual tools are also used for interactions between performer/participants and the environment.</p>  <p>See: https://www.youtube.com/watch?v=V7F5JLAL-Wo&feature=youtu.be See also: https://www.youtube.com/watch?v=0e4187XNaW4&t=15s See also: https://virtualreality.esi-group.com/our-profile/our-clients-across-world See also: https://robotstart.info/2017/12/15/gtc2017-holodeck.html See also: https://www.youtube.com/watch?v=bFNI3Iji0_c See also: https://www.wardsauto.com/technology/toyota-tilts-toward-future-maker-lab See also: https://www.esi-group.com/pt/empresa/eventos/2016/tra2016/agenda See also: https://www.youtube.com/watch?v=ReQVmXB5we0 See also: https://www.pny.com/File%20Library/Case%20Studies/Toyota-Case-Study.pdf See also: https://www.nvidia.com/en-us/design-visualization/technologies/holodeck/ See also: https://www.digitalengineering247.com/article/reinventing-collaboration-for-ar-vr/virtual-reality-and-augmented-reality</p>


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d)	providing at least one performer output device in electronic communication with said immersive virtual reality environment;	<p>Performer output device = Design project leaders and/or meeting organizers use high-end VR glasses such as HTC Vive and other professional VR glasses for 3D stereoscopic visuals and stereo audio to interact with the system.</p> <p>See: https://www.youtube.com/watch?v=V7F5JLAL-Wo&feature=youtu.be See also: https://www.youtube.com/watch?v=0e4187XNaW4&t=15s See also: https://virtualreality.esi-group.com/our-profile/our-clients-across-world See also: https://robotstart.info/2017/12/15/gtc2017-holodeck.html See also: https://www.youtube.com/watch?v=bFNI3Iji0_c See also: https://www.wardsauto.com/technology/toyota-tilts-toward-future-maker-lab See also: https://www.esi-group.com/pt/empresa/eventos/2016/tra2016/agenda See also: https://www.youtube.com/watch?v=ReQVmXB5we0 See also: https://www.pny.com/File%20Library/Case%20Studies/Toyota-Case-Study.pdf See also: https://www.nvidia.com/en-us/design-visualization/technologies/holodeck/ See also: https://www.digitalengineering247.com/article/reinventing-collaboration-for-ar-vr/virtual-reality-and-augmented-reality</p>
e)	providing at least one participant output device in electronic communication with said immersive virtual reality environment;	<p>Participant output devices = Toyota employees and customers use high-end VR glasses such as HTC Vive and other professional VR glasses for 3D stereoscopic visuals and stereo audio to interact with the system.</p>  <p>See: https://www.youtube.com/watch?v=V7F5JLAL-Wo&feature=youtu.be</p>


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f)	<p>having at least one live performer interact with at least one participant and said immersive virtual reality environment, by including with said virtual reality environment a live or prerecorded video image of said at least one live performer and audio communication between said at least one live performer and said at least one participant, or between said at least one participant and said at least one live performer, or both;</p>	<p>The live performer is the lead engineer, project manager, account manager or a fully motion captured "performer" in a 360-degree global virtual reality environment determining ergonomic, visual, functional or layout issues in a design review, collaborative meeting or demonstration.</p> <p>This collaborative group leader is most likely one or more persons on the design teams as a new project moves through product design reviews and issues. The leader (performer) interacts with one or more participant employees or customers inside a variety of Toyota computer generated virtual environments for design reviews.</p> <div data-bbox="787 982 1694 1364">  </div>

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		<p>The immersive virtual reality environment is displayed on headsets for collaborative meetings and design reviews. The performers/leaders are displayed as avatars and their heads or hands are clearly seen by the participants, and 2-way audio allows everyone to speak together in real-time.</p>  <p>See: https://www.youtube.com/watch?v=0e4187XNaW4&t=15s See also: https://www.youtube.com/watch?v=N4NbhuPsGAA See also: https://www.youtube.com/watch?v=cwfvurDGdjc See also: https://www.youtube.com/watch?v=V7F5JLAL-Wo&feature=youtu.be See also: https://www.youtube.com/watch?v=bFNI3Iji0_c See also: https://robotstart.info/2017/12/15/gtc2017-holodeck.html See also: https://www.esi-group.com/pt/empresa/eventos/2016/tra2016/agenda See also: https://www.pny.com/File%20Library/Case%20Studies/Toyota-Case-Study.pdf See also: https://www.nvidia.com/en-us/design-visualization/technologies/holodeck/ See also: https://www.digitalengineering247.com/article/reinventing-collaboration-for-ar-vr/virtual-reality-and-augmented-reality</p>
g)	having at least one participant interact with at least one such live performer and said immersive virtual reality environment, thereby resulting in an experience which is in part controlled by	Multiple Toyota design sites rely on a collaborative computer-generated 3D design process in the development and improvement of successful projects.

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	<p>said at least one participant and said at least one participant input device.</p>	<p>Participant(s) = customers, key decision makers, employees and vendors may be immersed in the headsets and other immersive displays to interact verbally and through visually controlled 3D environments.</p>  <p>Participant input devices and verbal collaboration control the outcome of the experience and empower design decisions (and other related meeting topics). Their use of various input devices (motion sensors, microphones, keyboards, mice, cameras, etc.) affect their experience from beginning to end. Experience control = engineers and others give instant feedback and changes can be further scrutinized and changed in the computer generated virtual reality environment.</p> <p>See: https://www.youtube.com/watch?v=0e4187XNaW4&t=15s See also: https://www.youtube.com/watch?v=N4NbhuPsGAA See also: https://www.youtube.com/watch?v=cwfvurDGdjc See also: https://www.youtube.com/watch?v=V7F5JLAL-Wo&feature=youtu.be See also: https://virtualreality.esi-group.com/our-profile/our-clients-across-world See also: https://www.youtube.com/watch?v=bFNI3Iji0_c See also: https://robotstart.info/2017/12/15/gtc2017-holodeck.html See also: https://www.esi-group.com/pt/empresa/eventos/2016/tra2016/agenda</p>

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